

THE HONORABLE JOHN H. CHUN

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

EMAN BAYANI, individually and on behalf of all  
others similarly situated,

Plaintiff,

vs.

T-MOBILE USA, INC.,

Defendant.

Case No. 2:23-cv-00271-JHC

**JOINT PROPOSED CASE SCHEDULE  
AND ORDER**

The parties hereby submit the following proposed case schedule taking into  
consideration counsel and witness calendars:

EVENT	PROPOSED DEADLINE
Deadline for Plaintiff to file motion for leave to amend and proposed amended complaint	November 16, 2023 (per Dkt. No. 32)
Deadline for Defendant to file motion to dismiss amended complaint	December 7, 2023
Deadline to join additional parties	February 23, 2024
Deadline for discovery related to numerosity. The parties agree to stay discovery on other issues until numerosity discovery is complete.	February 23, 2024
Deadline for Plaintiff to file motion for class certification	June 21, 2024

Deadline for Defendant to file response to motion for class certification	July 19, 2024
Deadline for Plaintiff to file reply in support of motion for class certification	August 2, 2024
Deadline to complete discovery	To be scheduled within two weeks of a ruling on class certification
Trial date	To be scheduled within two weeks of a ruling on class certification

The parties and their counsel have the following scheduling conflicts:

Plaintiff's counsel Elizabeth Adams is unavailable June 27 through July 7, 2024 for preplanned travel.

STIPULATED TO AND DATED this 3rd day of November, 2023.

TERRELL MARSHALL LAW GROUP PLLC

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By: /s/ Jennifer K. Chung

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*Attorneys for Defendant*

*Attorneys for Plaintiff and the Proposed Class*

**I. ORDER**

It is hereby ORDERED that the following case schedule is adopted:

EVENT	PROPOSED DEADLINE
Deadline for Plaintiff to file motion for leave to amend and proposed amended complaint	November 16, 2023 (per Dkt. No. 32)
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Trial date	To be scheduled within two weeks of a ruling on class certification

Dated: November 6, 2023

  
 THE HONORABLE JOHN H. CHUN  
 United States District Judge